

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RUBENSTEIN'S CONTRACT CARPET,
LLC, a Washington Limited Liability
Company,

Plaintiff,

v.

THE CONTINENTAL INSURANCE
COMPANY, a foreign insurer; and
CONTINENTAL CASUALTY COMPANY, a
foreign insurer

Defendants.

No. 2:16-cv-01075

DECLARATION OF RYAN J.
HESSELGESSER IN SUPPORT OF
DEFENDANTS' NOTICE OF REMOVAL

I, Ryan J. Hesselgesser, declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge and belief, the following is true and correct:

1. I am one of the attorneys representing defendants The Continental Insurance Company and Continental Casualty Company (collectively, "Defendants"), am over the age of 18 and competent to testify as to the matters set forth below.

2. As of the date of removal, Defendants have been served with a summons and complaint, and certificates of service have been issued from the Insurance Commissioner. A true and correct copy of the complaint is attached to the Notice of Removal in accordance with LCR

DECLARATION OF RYAN J. HESSELGESSER IN
SUPPORT OF DEFENDANTS' NOTICE OF
REMOVAL - 1

GORDON & POLSCER, L.L.C.
1000 Second Avenue, Suite 1400
Seattle, WA 98104
Telephone: (206) 223-4226

1 101(b). Attached as **Exhibit A** are true and correct copies of the pleadings served upon
2 Defendants in the State Court action.

3 3. As of the date of this removal, the pleadings have not been filed with the Superior
4 Court for King County, Washington. A demand under CR 3(a) to pay the filing fee and file the
5 summons and complaint with the Superior Court of King County within 14 days was issued to
6 plaintiff on July 1, 2016.

7 I declare the foregoing is true and correct under penalty of perjury of the laws of the
8 United States of America.

9
10 Executed this 6th day of July, 2016 at Seattle, Washington.

11
12 s/Ryan J. Hesselgesser

13 Ryan J. Hesselgesser, WSBA #40720

14 Gordon & Polscer, L.L.C.

15 1000 Second Avenue, Suite 1400

16 Seattle, WA 98104

17 Telephone: (206) 223-4226

18 Facsimile: (206) 223-5459

19 Email: rhesselgesser@gordon-polscer.com

CERTIFICATE OF SERVICE

I, Diana Brechtel, declare as follows:

1) I am a resident of the United States and a resident of the State of Washington. I am over the age of 18 years and not a party to the within entitled cause. I am employed by the law firm of Gordon & Polscer, L.L.C., whose address is 1000 Second Avenue, Suite 1400, Seattle, Washington 98104.

2) By the end of the business day on July 13, 2016, I caused to be served upon counsel of record at the addresses and in the manner described below, the following documents:

- **DECLARATION OF RYAN J. HESSELGESSER IN SUPPORT OF DEFENDANTS' NOTICE OF REMOVAL**
- **Certificate of Service.**

Attorneys for Plaintiff

Stephanie L. Grasia
Helsell Fetterman LLP
1001 Fourth Ave., Ste. 4200
Seattle, WA 98154-1154
sgrassia@helsell.com

☐ U.S. Mail
☒ Hand Delivery
☐ Telefax
☒ E-mail

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 13th day of July, 2016.

s/Diana Brechtel
Diana Brechtel, Paralegal